

Regarding the FCC notice of proposed rulemaking to Part 95, the following comments are submitted:

I am totally opposed to de-licensing (license by rule) the GMRS. The FCC should have recognized by now that the other services which it has de-licensed have become a wasteland of obscene language, illegal power amplifiers and transmitters and general chaos. I believe extending the license to a 10 year term would put the service more in line with other radio licenses managed by the FCC.

Concerning age requirements I see no value in having an age requirement as persons competent enough to apply for and operate a GMRS radio should be granted the license.

I agree with the FCC that all channels should be narrowband and this should also include MURS channels 4) 154.570 and 5) 154.600 mhz. This will make it easier on the radio manufacturers as less filtering components will be required. This should also serve to reduce interference to adjacent channels. This transition to narrowband should be phased in at the same deadline as is for Part 90 licenses. This should give all parties ample time to replace and or reconfigure radio site equipment. This licensee also believes that any part 90 type certified radio should also be granted Part 95 certification so long as the radio does not have any built-in scrambling capability.

I disagree with any proposed reduction in power of handheld GMRS radios. Most UHF handheld radios generally produce 4-5 watts. Reducing this power would neither benefit the public nor be enforceable. Sometimes that extra watt or two will get your signal through a wall or over a hill in times of an emergency.

I am vehemently opposed to the elimination of repeaters as this is one of the beauties of GMRS; fixed available repeaters shared by families and available with private tones and all call tones for use in emergencies. Repeater operation on the 675 nationwide emergency repeater pair is especially important, as it serves many travelers. Just take a look at mygmrs.com and you will see the cooperation

amongst our user base.

I do not believe that it serves the public interest to allow additional digital gps/texting capabilities on the GMRS repeater pairs unless the FCC allows additional emission designators such as those for DMR(MOTOTRBO and NXDN). These new designators would serve the public far better and increase the useable talk paths as well as becoming more spectrally efficient. Radios in the GMRS need to be more like tools not kid's toys as is the current situation with GMRS/FRS bubblepack radios. The FCC should never have allowed a licensed service to be mixed with an unlicensed service in the first place. These citizens citizens radio services were meant to serve the public's needs not those of the radio manufacturer's greed.

I agree with the FCC that dual VHF Marine/FRS radios should not be type certified as these are two totally different radio services and these types of radios are likely to be abused and could contribute to loss of life if used improperly. I take exception to some of the previous rulings regarding multi-band radios in the FRS, MURS and CB. While the public safety community along with the manufacturers have embraced multiband radios to improve interoperability, the FCC would have us believe that the manufacturers have our best interest at heart. In reality they would rather sell us 3 radios than one which can access all 3 citizens radio services. Just think of how valuable a tri-band citizens radio might be in an event like Hurricane Katrina or the terrorist attacks of 9/11. Again these our radio services and we are the ones who should be benefitting from them. These types of multiband radios have been around for some time in the amateur radio service and their time has come in the citizens radio services as not everyone holds an amateur radio license.

I agree that handsfree microphones be allowed in the CB services. In fact they should be encouraged in all 2-way services to make for safer driving habits.

I disagree with the proposal to lower CB power or use directional antennas. The FCC should

totally rethink the CB service as a medium to long range service as

this is what it really is. The placement of this citizens radio service in a band known to propagate long distances was a mistake in the first place. My thoughts

are that the FCC should transition the band to include new narrowband FM channels with CTCSS/DCS capability along with AM/SSB and a max power of 25 watts.

This would allow the ability to have selective calling while still being interoperable with legacy radios. The FCC should abandon its unenforceable 155 mile rule

and let nature take its course. There have been many occasions where someone half a world away was able to help someone in distress via skywave propagation.

Dis-allowing directional antennas will have little effect on skywave propagation and will be difficult to enforce. The FCC should consider licensing those stations

wishing to run higher power. The FCC should consider this alternative to clean up the so called "FREEBAND". This would in effect create economies of scale and be

a good start to cleaning up some of the problems the FCC created for itself years ago by "License By Rule"

Sincerely, Brian R chapman KAF2088